

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA

JOHN DEREK WILLIAMS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 2:06-cv-716-WKW
	)	
BLUE CROSS BLUE SHIELD	)	
OF ALABAMA and	)	
NEW HORIZON CHURCH,	)	
	)	
Defendants.	)	

**ANSWER**

NOW COMES Defendant New Horizon Church in response to the Plaintiff's Complaint and states as follows:

1. Admitted.
2. Admitted.
3. Admitted.

**FACTS**

1. Admitted.
2. Admit that the Plaintiff left the employment of New Horizon Church in July 2004; otherwise, denied.

3. Unknown to this Defendant.
4. Unknown to this Defendant.
5. Unknown to this Defendant.
6. Unknown to this Defendant.

7. Unknown to this Defendant.
8. Unknown to this Defendant.

**COUNT ONE**

**E.R.I.S.A.**

1. Defendant incorporates by reference ¶¶ 1-8 above as if fully set out herein.
2. Admitted.
3. Admitted.
4. Admitted that the action is an action to recover benefits but denied that Plaintiff is due to benefits.
5. Admitted.
6. Unknown to this Defendant.

**DONE** this the 13<sup>th</sup> day of September, 2006.

s/ Micheal S. Jackson  
**MICHEAL S. JACKSON**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 13, 2006, I electronically filed an ANSWER with the Clerk of the Court using the AlaFile System which will send notification of such filing to the following:

J. Bernard Brannan, Jr., Esq.  
THE BRANNAN LAW FIRM, P.C.  
602 South Hull Street  
P. O. Box 307  
Montgomery, AL 36101

and I hereby certify that I have mailed by United States Postal Service the document to the following NON-ALAFILE System participants:

s/ Micheal S. Jackson

**OF COUNSEL**